

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No: 1: 20-cr-10012-IT
)	
PAUL BATEMAN,)	
Defendant.)	

JOINT MOTION TO CONTINUE SENTENCING HEARING

Now comes counsel for Mr. Bateman and the government and jointly request that the sentencing hearing scheduled for April 16, 2024, be continued to a date in approximately 4 weeks from that date, on a date convenient to the court and the parties. Both counsel for Mr. Bateman and the government are available the week of May 20, 2024, if convenient to the Court.¹

As grounds, counsel submit that additional time is required to prepare for the sentencing hearing in Mr. Bateman's case and to resolve outstanding requests for restitution. Specifically, on March 29, 2024, the government provided materials for eleven (11) requests for restitution on behalf of series victims, and on April 3, 2024, at the request of defense counsel, provided additional information relative to those 11 requests. Those materials are voluminous, numbering more than 1,000 pages, and although defense counsel has begun to review them, she has been unable to complete her review and confer with victims' counsel and/or representatives regarding their requests for restitution. The government estimates that an additional fifteen (15) requests for restitution from different series victims will be made. The government is working diligently to compile the remaining requests for restitution in this case, and expects that materials for those

¹ Counsel for the government will be on scheduled leave from May 7 through May 17, 2024, and counsel for Mr. Bateman will be on scheduled leave from May 3 through May 8, 2024.

series victims will be provided in approximately two weeks.²

In an effort to adequately prepare for sentencing, and to address and resolve any potential disputes regarding restitution in advance of sentencing, undersigned counsel submits that a continuance will permit the parties to receive and review restitution requests and materials and will permit undersigned counsel sufficient time to confer with victims' counsel and/or representatives. Counsel further submits that the restitution requests, and the potential resolution of the requests, will enable the parties to adequately prepare for sentencing and craft their respective sentencing recommendations, including with respect to whether statutory fines are appropriate based on Mr. Bateman's ability to pay and anticipated restitution obligations.

Mr. Bateman remains on conditions of release pending sentencing, supervised by U.S. Pretrial Service. He is in complete compliance with those conditions, which include location monitoring and a curfew.

Wherefore, the parties jointly request that the currently scheduled sentencing be continued to a date the week of May 20, 2024, if convenient to the Court.

PAUL BATEMAN

By his attorney,

/s/ Sandra Gant

Sandra Gant, MA BBO # 680122
Federal Defender Office
51 Sleeper Street, 5th Floor
Boston, MA 02210
617-223-8061

JOSHUA S. LEVY

Acting United States Attorney

/s/ Anne Paruti

Anne Paruti
Assistant United States Attorney

² The government has provided victim impact statements to counsel and to Probation for all victims in this case, including the 15 for whom restitution requests and materials remain outstanding.

CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through email and the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on April 4, 2024.

/s/ Sandra Gant
Sandra Gant